

# EXHIBIT 1

<b>CHARGE OF DISCRIMINATION</b>		<b>AGENCY</b>	<b>CHARGE NUMBER</b>
The Privacy Act of 1974 affects this form; See Privacy Act Statement before completing this form.		FEPA EEOC	420-2018-03239
and EEOC			
State or local Agency, if any			
<b>NAME (Indicate Mr., Ms., Mrs.)</b> Olivia Kioni-Hendrieth		<b>HOME TELEPHONE (Include Area Code)</b> [REDACTED]	
<b>STREET ADDRESS</b>	<b>CITY, STATE AND ZIP CODE</b>	<b>SSN</b>	<b>DATE OF BIRTH</b>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
<b>NAME</b> Auburn University	<b>NUMBER OF EMPLOYEES, MEMBERS</b> 500+	<b>TELEPHONE (Include Area Code)</b> (334) 844-4412	
<b>STREET ADDRESS</b>	<b>CITY, STATE AND ZIP CODE</b>	<b>COUNTY</b>	
1000 Industrial School Road, Mt. Meigs, AL 36057		Montgomery	
<b>NAME</b>	<b>TELEPHONE NUMBER (Include Area Code)</b>		
[REDACTED]	[REDACTED]		
<b>STREET ADDRESS</b>	<b>CITY, STATE AND ZIP CODE</b>	<b>COUNTY</b>	
[REDACTED]	[REDACTED]	[REDACTED]	
<b>CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))</b>		<b>DATE DISCRIMINATION TOOK PLACE</b> EARLIEST (ADEA/FEPA) LATEST (ALL)	
<input checked="" type="checkbox"/> RACE      COLOR <input checked="" type="checkbox"/> SEX      RELIGION      AGE		April 17, 2016      continuing to date	
<input checked="" type="checkbox"/> RETALIATION      NATIONAL ORIGIN      DISABILITY      OTHER (Specify)		<input checked="" type="checkbox"/> CONTINUING ACTION	
<b>THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):</b>			
<p>I am an African-American Female. Respondent hired me in July 2010. I am a Mental Health Specialist III. My salary was \$36,000.00 plus benefits. I was employed to work on the ABSOP Program for the Psychology Department. The focus of the ABSOP program included the assessment and treatment of juveniles that have been adjudicated for illegal sexual behavior.</p> <p>I was qualified for the positions I have held with the Respondent. It took approximately four years for me to get promoted to Mental Health Specialist II, and another two years to get promoted to Mental Health Specialist III. Less qualified Caucasian employees were paid higher wages than African American employees, including me, and were placed in higher level and higher paying positions. African American employees were not promoted as quickly or as often as less qualified Caucasians. Jan Newman, JD PhD, Assistant Clinical Professor, stated she heard Barry Burkhardt, PhD, Professor and Director of ABSOP Program, make negative comments about Blacks that made her feel uncomfortable. Dr. Burkhardt is part of the Executive group and makes hiring and salary decisions. Caucasians received superior treatment to African-Americans as it related to hiring, promotions, and pay.</p>			
(particulars continued on second page)			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate filing with them in the processing of my charge in accordance with their procedures.		NOTARY - (When necessary for State and Local Requirements) [Signature]	
I declare under penalty of perjury that the foregoing is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
Date: 28 July 2018 Charging Party (Signature): [Signature]		SIGNATURE OF COMPLAINANT [Signature]	
RECEIVED SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year) JUL 27 2018 SJK U.S. EEOC Birmingham District Office		ADDIE MARIA SMITH Commission Expires NOTARY PUBLIC Apr 13 2022 Alabama State Seal	

**OLIVIA KIONI-HENDRIETH V. AUBURN UNIVERSITY**  
**EEOC CHARGE**  
**PAGE 2**

On or about April 17, 2016, I requested a promotion to the position of Mgr, Clinical Services. I am qualified for the position and have performed many of the job functions of this position since 2014. Dr. Jan Everhart Newman, Former ABSOP Psychologist, advocated for my promotion to Dr. Burkhardt to no avail. I did not get the position, and was told that once I was licensed, I would be promoted. In late 2017, I again applied for the open and available position of Mgr, Clinical Services, and was licensed. I interviewed for the position, and was told by Alicia Williams, ABSOP Program Manager that I, "...blew the interview out of the water." On or about February 26, 2018, Dr. Burkhardt informed me, that once again I was not selected for the Mgr, Clinical Services position. The position was given to a Caucasian male, Jason Orick. My race and/or my gender was a motivating factor in the position not being awarded to me.

I am assigned a higher caseload of students than Caucasian employees in the same or similar positions while at the same time facilitating several group therapy sessions. Caucasian employees have not been required to perform the same amount of work and are not held to the same standard as me and other African American employees. I have also been denied bonuses or been paid less of a bonus when Caucasian employees have received a bonus or been paid more of a bonus than me.

I believe the Respondent has exhibited a history of, and pattern and practice of, discriminating against African-American employees as a class with respect to the terms and conditions of their employment.

I have been discriminated against and treated differently than Caucasian employees, because of my race, African American, and because of my gender, female, and retaliated against because of my complaints and protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.

  
OLIVIA KIONI-HENDRIETH

